

March 20, 2016

Letter of Appeal
Ms. Marlene H. Dortch
Federal Communication Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: In the Matter of Request for Review of the Universal Service Administrator, Schools
and Libraries Universal Service Support Mechanism.
CC Docket No.02-6

In re: **Reece School**
Billed Entity Number: 10268
Appellant: E rate Solutions Group
Fund Year: 2015 FCC Form 471:1006726

Dear Ms. Dortch:

This is a request for reconsideration as the enclosed appeal was submitted 2 days late due to unavailability of the school as the executive staff resigned/changed. Please issue a waiver of the 60-day appeal rule so this appeal can be considered.

I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any delays in providing requested information which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,
Katherine M. Weiss
Consultant

FUNDING COMMITMENT DECISION LETTER
(Funding Year 2015: 07/01/2015 - 06/30/2016)

August 7, 2015

KATHERINE WEISS
REECE SCHOOL
P.O. Box 460
Erate Solutions Group
Colts Neck, NJ 07722

Re: FCC Form 471 Application Number: 1006726
Billed Entity Number (BEN): 10268
Billed Entity FCC Registration Number (FCC RN): 0022434690
Nickname: Reece 15

Thank you for your Funding Year 2015 application for Universal Service Support and for any assistance you provided throughout our review. The current status of the funding request(s) in the FCC Form 471 application cited above and featured in the Funding Commitment Report(s) (Report) at the end of this letter is as follows.

- The amount, \$4,440.00 is "Approved."

Please refer to the Report following this letter for specific funding request decisions and explanations. The Universal Service Administrative Company (USAC) is also sending this information to your service provider(s) so preparations can begin for implementing your approved discount(s) after you file FCC Form 486, Receipt of Service Confirmation and Children's Internet Protection Act and Technology Plan Certification Form. A guide that provides a definition for each line of the Report is available in the Guide to USAC Letter Reports in the Reference Area of our website.

NEXT STEPS

- Work with your service provider to determine if you will receive discounted bills or if you will request reimbursement from USAC after paying your bills in full.
- Review Children's Internet Protection Act (CIPA) requirements.
- File FCC Form 486.
- Invoice USAC using the FCC Form 474, Service Provider Invoice (SPI) Form, or FCC Form 472, Billed Entity Applicant Reimbursement (BEAR) Form, as products and services are being delivered and billed.

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., FCDL) and the decision you are appealing:
 - Appellant name,
 - Applicant name and service provider name, if different from appellant,
 - Applicant BEN and Service Provider Identification Number (SPIN),
 - FCC Form 471 Application Number 1006726 and the Funding Request Number (FRN) or Numbers as assigned by USAC,
 - "Funding Commitment Decision Letter for Funding Year 2015," AND
 - The exact text or the decision that you are appealing.

3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542.

To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal
Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the Schools and Libraries section of the USAC website.

OBLIGATION TO PAY NON-DISCOUNT PORTION

Applicants are required to pay the non-discount portion of the cost of the products and/or services to their service provider(s). Service providers are required to bill applicants for the non-discount portion. The FCC stated that requiring applicants to pay their share ensures efficiency and accountability in the program. If USAC is being billed via the FCC Form 474, the service provider must bill the applicant at the same time it bills USAC. If USAC is being billed via the FCC Form 472, the applicant pays the service provider in full (the non-discount plus discount portion) and then seeks reimbursement from USAC. If you are using a trade-in as part of your non-discount portion, please refer to Disposal or Trade-in of Equipment posted in the Reference Area of our website for more information.

NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.

Schools and Libraries Division
Universal Service Administrative Company

FUNDING COMMITMENT REPORT
Billed Entity Name: REECE SCHOOL
BEN: 10268
Funding Year: 2015

Comment on RAL corrections:

The applicant failed to supply documentation to support the requested discount. As a result of this action, the discount of this FCC Form 471 was decreased from 80% to 20% minimum discount percentage.

FCC Form 471 Application Number: 1006726
Funding Request Number: 2733612
Funding Status: Funded
Service Type: Internet Access
FCC Form 470 Application Number: 783830001272246
SPIN: 143026089
Service Provider Name: Promenet, Inc.
Contract Number: T
Billing Account Number: N/A
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$12,000.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$12,000.00
Discount Percentage Approved by the USAC: 20%
Funding Commitment Decision: \$2,400.00 - FRN approved as submitted

FCDL Date: 08/07/2015

Wave Number: 011

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2016

Consultant Name: KATHERINE WEISS

Consultant Registration Number (CRN): 16043598

Consultant Employer: E Rate Solutions Group Inc

FUNDING COMMITMENT REPORT
Billed Entity Name: REECE SCHOOL
BEN: 10268
Funding Year: 2015

Comment on RAL corrections:

The applicant failed to supply documentation to support the requested discount. As a result of this action, the discount of this FCC Form 471 was decreased from 80% to 20% minimum discount percentage.

FCC Form 471 Application Number: 1006726
Funding Request Number: 2733618
Funding Status: Funded
Service Type: Internet Access
FCC Form 470 Application Number: 783830001272246
SPIN: 143019523
Service Provider Name: Time Warner Cable Information Services (New York), LLC
Contract Number: T
Billing Account Number: N/A
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$10,200.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$10,200.00
Discount Percentage Approved by the USAC: 20%
Funding Commitment Decision: \$2,040.00 - FRN approved as submitted

FCDL Date: 08/07/2015
Wave Number: 011
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2016
Consultant Name: KATHERINE WEISS
Consultant Registration Number (CRN): 16043598
Consultant Employer: E Rate Solutions Group Inc

FUNDING COMMITMENT REPORT
Billed Entity Name: REECE SCHOOL
BEN: 10268
Funding Year: 2015

Comment on RAL corrections:

The applicant failed to supply documentation to support the requested discount. As a result of this action, the discount of this FCC Form 471 was decreased from 80% to 20% minimum discount percentage.

FCC Form 471 Application Number: 1006726

Funding Request Number: 2733624

Funding Status: Not Funded

Service Type: Voice Services

FCC Form 470 Application Number: 783830001272246

SPIN: 143030766

Service Provider Name: Windstream Communications, LLC

Contract Number: T

Billing Account Number: N/A

Service Start Date: 07/01/2015

Service End Date: 06/30/2016

Contract Award Date: N/A

Contract Expiration Date: N/A

Shared Worksheet Number:

Number of Months Recurring Service Provided in Funding Year: 12

Annual Pre-discount Amount for Eligible Recurring Charges: \$9,000.00

Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00

Pre-discount Amount: \$9,000.00

Discount Percentage Approved by the USAC: 0%

Funding Commitment Decision: \$0.00 - Ineligible Services/Products

Funding Commitment Decision Explanation: The category of service of this FRN is Voice Services. According to the FCC Order 14-99, all Voice Services are subject to a 20% per year phase down of support beginning in Funding Year 2015. Therefore, your discount rate of 20% is reduced to 0% and this Voice FRN is denied.

FCDL Date: 08/07/2015

Wave Number: 011

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2016

Consultant Name: KATHERINE WEISS

Consultant Registration Number (CRN): 16043598

Consultant Employer: E Rate Solutions Group Inc

FUNDING COMMITMENT REPORT
Billed Entity Name: REECE SCHOOL
BEN: 10268
Funding Year: 2015

Comment on RAL corrections:

The applicant failed to supply documentation to support the requested discount. As a result of this action, the discount of this FCC Form 471 was decreased from 80% to 20% minimum discount percentage.

FCC Form 471 Application Number: 1006726
Funding Request Number: 2733628
Funding Status: Not Funded
Service Type: Voice Services
FCC Form 470 Application Number: 783830001272246
SPIN: 143000677
Service Provider Name: Verizon Wireless (Cellco Partnership)
Contract Number: MTM
Billing Account Number: N/A
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$10,200.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$10,200.00
Discount Percentage Approved by the USAC: 0%
Funding Commitment Decision: \$0.00 - Insufficient documentation
Funding Commitment Decision Explanation: DR1: Applicant has not provided sufficient documentation needed to determine the eligibility of the following item: vendor documentation that supports request for cellular voice service over 12 lines for \$850/month. <><><><><> DR2: The category of service of this FRN is Voice Services. According to the FCC Order 14-99, all Voice Services are subject to a 20% per year phase down of support beginning in Funding Year 2015. Therefore, your discount rate of 20% is reduced to 0% and this Voice FRN is denied.
FCDL Date: 08/07/2015
Wave Number: 011
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2016
Consultant Name: KATHERINE WEISS
Consultant Registration Number (CRN): 16043598
Consultant Employer: E Rate Solutions Group Inc

October 5, 2015

Letter of Appeal
Schools & Libraries Division – Correspondence Unit
100 South Jefferson Rd
PO Box 902
Whippany, NJ 07981

Appeal Reviewer:

This is a "Letter of Appeal" for Form 471 Application 1006726 with associated FRN's: 2733612, 2733618, 2733624, 2733628

Case # 22- 851611

BEN and contact information:

Appellant Name:

Katherine Weiss, Authorized Representative
Email: kweiss@erategroup.com
Phone: 732-946-8300
Fax: 732-879-0400

Applicant Name & BEN:

Name: **Reece School**
BEN: **10268**

471 Reference & Funding Year:

Form 471: 1006726
Funding Year: 2015

Text of Funding Commitment Decision Explanation:
Requested info not provided

Reason for Appeal and Documentation:

Information was available and review was during Summer Deferral period.

Specific Concerns in reference to this application: NA

471 – 1006726

FRN Information:

Funding Request Number: 2733612

Service Provider: Promenet

SPIN: 143026089

471 – 1006726

FRN Information:

Funding Request Number: 2733618

Service Provider: Time Warner

SPIN: 143019523

471 – 1006726

FRN Information:

Funding Request Number: 2733624

Service Provider: Windstream

SPIN: 143030766

471 – 1006726
FRN Information:
Funding Request Number: 2733628
Service Provider: Verizon Wireless
SPIN: 143000677

A reversal of the denial of this funding request is sought. I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any delays in providing requested information which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,

Katherine M. Weiss
Consultant

November 3, 2013

PIA Reviewer

Program Reviewer

Schools and Libraries Division

Our School has used the SLD approved alternative discount measures to qualify students for the discount level requested. The survey method was used as stated on the SLD web page:

<http://www.usac.org/sl/applications/steps05/alternative-discount-mechanisms.aspx>

The following acceptable alternatives measures of were used to determine eligibility:

A. Family income level at or below 185% of the federal poverty guideline.

• **Number of Students at/or below = 11**

B. Participation in one or more of the following programs: This is an unduplicated count – if a student qualified in more than one area, only one area is listed below.

- **Medicaid = 0 students**
- **Food stamps = 0 students**
- **Supplementary Security Income (SSI) = 0 students**

Based upon the criteria above, the student information is:

1. Total # of students enrolled: 86
2. Total # of Surveys/Applications Sent: 86
3. Total # of Surveys/Applications returned: 43
4. Total # of students Eligible by above Criteria: 11
5. Are the survey results kept on file: Yes
6. Sample Completed Survey: See email attachment

Entity Number: **10264**

Numbers eligible are based upon actual numbers, not an extrapolation of percentages based upon data returned.

Certification Statement:

"I certify that only those students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 9a, of Block 4 (Worksheet A) of the Form 471."

Sincerely,



Name *John Lata*

Title *CFO - CCA*

New York City Department of Education
2013-2014 Application for Free and Reduced-Price Meals

ATTACHMENT 1

USE BLACK OR DARK BLUE INK

COMPLETE ONE APPLICATION FOR ALL CHILDREN IN HOUSEHOLD ATTENDING ANY SCHOOL. RETURN APPLICATION TO YOUR CHILD'S SCHOOL.

☐ **I DO NOT QUALIFY FOR FREE OR REDUCED-PRICE MEALS.** Complete PART 2 with student information, and go to PART 5 to sign and date form. Return to school.

WRITE THE NAMES OF ALL CHILDREN ATTENDING SCHOOL IN GRADES PRE-K TO HIGH SCHOOL.

| PART 2 | BIRTH DATE | | | PRINT LEGAL NAME OF STUDENTS ATTENDING SCHOOL (*OPTIONAL INFORMATION) | | | | | | | | | | FOSTER CHILD MARK <input checked="" type="checkbox"/> | Write SCHOOL NAME and letter for SCHOOL BOROUGH for each student M=Manhattan X=Bronx Q=Queens K=Brooklyn R=Staten Island | | |
|--------|------------|----|----|---|----|-----------|--------|----------------------|-------------|----------------|--|--|--|---|---|-------------------|---|
| | MM | DD | YY | FIRST NAME | MI | LAST NAME | GENDER | *STUDENT ID (OSIS #) | SCHOOL NAME | SCHOOL BOROUGH | | | | | | | |
| 1 | | | | [REDACTED] | | | | | | | | | | F | | The Rector School | M |
| 2 | | | | | | | | | | | | | | | | | |
| 3 | | | | | | | | | | | | | | | | | |
| 4 | | | | | | | | | | | | | | | | | |
| 5 | | | | | | | | | | | | | | | | | |

3 If anyone receives either SNAP (food stamp) or TANF benefits, write your case number here. Go to Part 5 to sign and date form.

Case Number: [REDACTED]

The case number is found on your benefit letter.

WRITE FIRST AND LAST NAMES OF EVERYONE LIVING IN HOUSEHOLD, INCLUDING ADULT WHO SIGNS THE FORM

WRITE ALL CURRENT INCOME AND PAY PERIOD FOR ALL HOUSEHOLD MEMBERS

Current income is ALL monies received and how often from ALL sources. If how often is not included, the income reported will be processed as received WEEKLY. Use these letters to indicate how often income is received. **W=WEEKLY B=EVERY 2 WEEKS M=MONTHLY T=TWICE A MONTH Y=YEARLY**

| PART 4 | DO NOT WRITE STUDENT NAMES LISTED IN PART 2 | GROSS EARNINGS FROM WORK (BEFORE DEDUCTIONS): ALL JOBS | CHILD SUPPORT / ALIMONY PAYMENTS | PAY FROM PENSION, RETIREMENT / SSI | ANY OTHER INCOME | NO INCOME MARK <input checked="" type="checkbox"/> |
|--------|---|--|----------------------------------|------------------------------------|------------------|--|
| | | How Often? | How Often? | How Often? | How Often? | |
| 1 | [REDACTED] | \$ 12,989.99 / W | \$ / | \$ / | \$ / | |
| 2 | [REDACTED] | \$ / | \$ / | \$ / | \$ / | |
| 3 | | \$ / | \$ / | \$ / | \$ / | |
| 4 | | \$ / | \$ / | \$ / | \$ / | |
| 5 | | \$ / | \$ / | \$ / | \$ / | |
| 6 | | \$ / | \$ / | \$ / | \$ / | |
| 7 | | \$ / | \$ / | \$ / | \$ / | |

TOTAL NUMBER OF PERSONS IN HOUSEHOLD

Add the names listed in Parts 2 and 4 → 03

Address

Apt #

City

Zip

[REDACTED] Bronx 10456

6 SIGNATURE: AN ADULT HOUSEHOLD MEMBER MUST SIGN THIS APPLICATION AND PROVIDE THE LAST FOUR DIGITS OF THEIR SOCIAL SECURITY NUMBER (SSN), OR MARK THE "I DO NOT HAVE A SSN BOX" BEFORE IT CAN BE APPROVED. I certify that all of the information is true and that all income is reported. I understand that the information is being given for the school to receive federal funds. The school officials may verify the information, and deliberate misrepresentation of the information may subject me to prosecution under applicable state and federal laws and my children may lose meal benefits.

☒ [Signature]
 ADULT HOUSEHOLD MEMBER NAME AND SIGNATURE

Write last 4 numbers of SSN

[REDACTED]
 ADULT HOUSEHOLD MEMBER

If you do not have a SSN mark ☒ here →

ENTER TODAY'S DATE

[REDACTED]

HOME PHONE

DAYTIME PHONE

CELL PHONE

Best Time To Call

☐ 8 am - 11 am

☐ 11 am - 2 pm

☒ 2 pm - 5 pm

☐ 5 pm - 8 pm